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March 29, 2022

VIA ECF

Honorable Robert Kugler, U.S.D.J.
U.S. District Court - District of New Jersey
Mitchell S. Cohen Building & US
Courthouse
1 John F. Gerry Plaza, Courtroom 4D
4th and Cooper Streets
Camden, New Jersey 08101

Honorable Thomas I. Vanaskie (Ret.)
Special Master
Stevens & Lee
1500 Market St., East Tower, Suite 1800
Philadelphia, Pennsylvania 19103-7360

Re: ***In re Valsartan, Losartan, and Irbesartan Liability Litigation,***
Case No. 1:19-md-02875-RBK (D.N.J.)

Dear Judge Kugler and Judge Vanaskie:

Please accept this letter on behalf of Plaintiffs in advance of tomorrow's case management conference.

1. Defendants' Request for Production of Valsartan Testing Documents from Plaintiffs' Expert Ron Najafi.

The Parties have met and conferred on this issue over the past few weeks. Plaintiffs wrote to Defendants earlier this morning and confirmed that Dr. Najafi did not perform the testing they were interested in, and believe the issue should now be resolved with no further request for post-deposition discovery from Dr. Najafi. If Defendants disagree, they should be required to meet and

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confer further, and then if they wish to press the issue further to brief the issue, and provide Plaintiffs the opportunity to submit a responsive brief.

Plaintiffs asked that Defendants remove this issue from the agenda since there is no dispute for the Court to consider at present, but Defendants insisted on presenting the issue in case it may be presented in the future. Plaintiffs are unclear as to what Defendants intend to state and will be prepared to address the “issue” if necessary during the conference.

2. Pending Motion for Clarification.

Plaintiffs received Defendants’ motion for clarification, and will be responding and cross-moving on or before the April 4, 2022 deadline pursuant to the Rules.

3. Unopposed Request for Extension of Class Certification Briefing Deadlines.

Plaintiffs do not oppose Defendants’ request for an additional week-long extension to the class certification briefing deadlines, which Defendants stated was needed due to the transition in counsel for the ZHP entities.

4. PFS Deficiencies and Orders to Show Cause.

Plaintiffs will be prepared to address this issue during the case management conference.

Respectfully,



ADAM M. SLATER

Cc: All counsel of record (via ECF)